

April 18th, 2022

Heppner District Ranger
Doug McKay
Heppner Ranger Station
PO Box 7
Heppner OR, 97836

RE: Oregon Chapter of Backcountry Hunters & Anglers and Theodore Roosevelt Conservation Partnership Comments on the Ellis Integrated Vegetation Project

District Ranger McKay and Ellis Project Team:

Established in 2002, the Theodore Roosevelt Conservation Partnership (TRCP) is the foremost coalition of hunting, angling, conservation, and recreation groups and individual grassroots partners. With 61 organizational partners and more than 130,000 individual members, the TRCP works to 1) safeguard fish and wildlife habitat; 2) increase funding for fish and wildlife conservation; and 3) provide sustainable public access to outdoor recreation. Founded in 2004 around an Oregon campfire, Backcountry Hunters and Anglers has grown to lead the nation as the public lands advocacy organization for sportsmen and women. We represent hunters, anglers and public lands enthusiasts from all fifty states including 1,500 members in Oregon who care deeply about the management of our public lands.

The TRCP and ORBHA support the objectives of the Ellis Project as outlined in the Draft Environmental Impact Statement (DEIS) to:

- (1) increase forest health and vigor
- (2) enhance unique plant communities
- (3) improve wildlife habitat
- (4) maintain and continue public and traditional use
- (5) and protect values at risk and increase public and firefighter safety in the event of a wildfire.

While all aspects of the project goals are important, the TRCP and ORBHA are particularly supportive of the project's goals to improve forage quality and habitat for elk, mule deer, and other wildlife through vegetative treatments and strategic road closures. The project also importantly aims to improve elk distribution to reduce conflict with elk on private land. Please review our below comments and recommendations which are intended to ensure the project is implemented most successfully.

Vegetation Management:

The TRCP/ORBHA support the desire to maintain hiding and security cover, while also applying silvicultural actions that stimulate big game forage. We strongly support active forest management and are supportive of thinning and prescribed burning. We offer a few specific comments related to silviculture activities.

- We agree with the comments from the Oregon Hunters Association that suggest that the thinning prescriptions incorporate the creation of gaps, or skips, of 2 to 5 acres to enhance big game forage for a longer period than provided by a normal thinning.
- The DEIS specifies that where appropriate to meet objectives, some areas would be planted with shrubs or hand seeded with native grasses and forbs to offer forage and cover to wildlife species within 5 years of treatment. To maximize the effectiveness of the project goals, we recommend reseeding within two years of the completion of treatment.
- ORBHA/TRCP understands the need to cut large trees in a variety of circumstances to improve forest health. For example, to improve Historical Range of Variability within the forest stands and/or to remove all encroaching conifers within aspen stands. We recommend that some trees are left on the forest floor for bear dens/use by other wildlife, etc.

Fuel Breaks:

We understand the need and desire to create fuel breaks along the open road system and we appreciate that all fuel breaks will be designed to incorporate varied spacing, skips for wildlife connectivity and tree clumping to accommodate wildlife patches.

- However, we agree with staff from the Oregon Department of Fish and Wildlife in that we do not feel that the level outlined in alternative five is necessary to meet the needs of the project. We agree that the fuel breaks outlined in Alternative four is a good compromise between creating defensible fuel breaks and maintaining visual cover for elk and deer along the open road system. Creating open areas along the open road system also allows hunters to see elk and deer further off the road and increases elk and deer vulnerability to harvest.

Aspen/wet meadow and sagebrush steppe habitat restoration:

We strongly support these restoration goals.

- With regards to aspen enhancement, we suggest that all conifers within aspen groves be removed regardless of DBH as allowed within alternative 5.
- We further recommend that post treatment, these areas are fenced to protect the resource from domestic cattle grazing at least until restoration has been monitored to be successful.
- Retain existing snags where possible and consider developing water sources away from aspen stands wet meadows for grazing where the impacts are less detrimental to wildlife/aquatic resources.

Undeveloped Lands:

We agree with and support the agency's decision not to propose any means of mechanical harvest or thinning within the Inventoried Roadless Areas of the project area.

- We recommend providing additional implementation and design details related to the proposed mechanical treatments within the other 'undeveloped lands' identified in the Umatilla Forest Plan. Alternative 5 proposes to treat up to 27,515 acres of undeveloped lands with mechanical thinning treatments, resulting in a 58.2% loss of undeveloped lands as stated in the DEIS. Additional information and details around project implementation in these areas to minimize any effects on the undeveloped nature of these areas should be prioritized and made available to the public to better inform the benefits/costs and other alternatives available for harvest and vegetation management within these undeveloped lands to ensure they remain high quality habitat.

Travel Management/ Wildlife Habitat/ Elk Security:

More than 30 studies conducted over 40+ years have consistently shown that elk avoid roads open to motorized uses on public lands during both hunting and non-hunting seasons (Dr. Michael Wisdom, USFS Webinar Dec. 1, 2020).

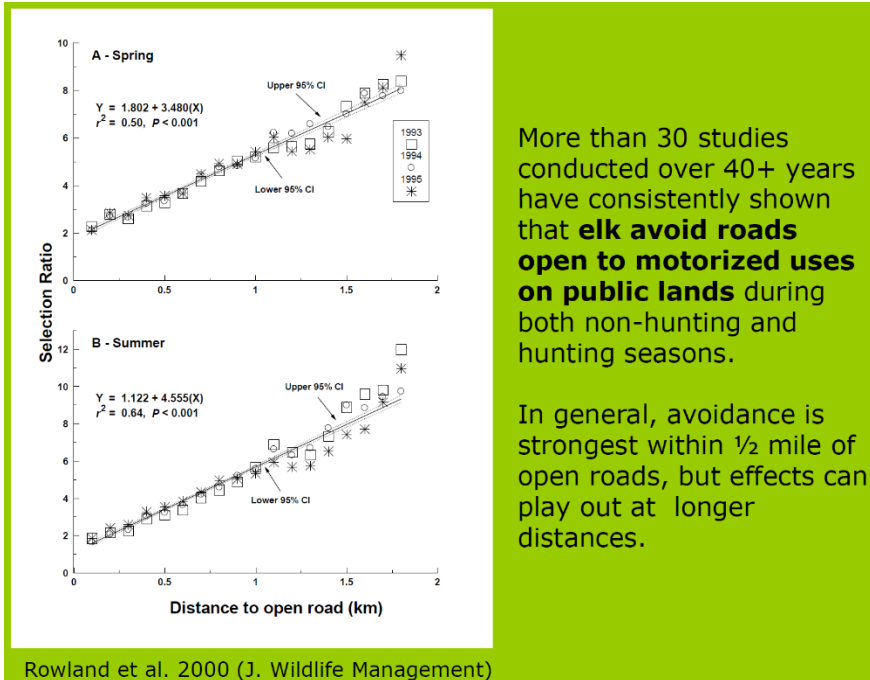


Figure 1- Presentation slide from Dr. Michael Wisdom in 2020 that illustrates a strong preference by elk to utilize habitat further from open roads.

Areas greater than 0.5 miles from roads open to motorized vehicles and 250 acres or greater in size, are considered security or refuge areas where elk are less likely to be impacted by motorized vehicle use (Hillis et al. 1991). Vulnerability and hunting mortality have been found to be higher in forested stands with greater road densities and less hiding cover.

The TRCP/ORBHA strongly support the agencies proposal for strategic road closures within Alternative 5 of the DEIS. We also support the agencies definition of elk security in the DEIS which is defined by areas of ≥ 250 acres $\geq 1/2$ mile from a road making up $\geq 30\%$ of an area. All three parts of that definition are critically important, and without one, the security needs for elk will not be met. We appreciate the agencies decision to create alternative 5 to meet the minimum requirement for 30% of an area to provide elk security, all while retaining more than 2/3 of the existing road network for continued open use by the public for access. Coupling road management with vegetation treatments will help improve elk distribution, encourage their use of public lands, minimize private land agricultural damage, and provide multiple use opportunities in a safe sustainable way while also balancing the needs for wildlife

According to the DEIS, currently, security is limited with approximately 340 miles of roads open to motorized use with only 11% of the project area that is considered “security” based on the definition above. Across the project area open road density is about 1.9 miles per square mile. Historically, elk used the National Forest lands in spring, summer, and fall, and mostly wintered at lower elevations which are now largely privately owned lands that have been converted to agriculture. Over the past several decades, elk have been using the private lands to the north of the Ellis Project area earlier in the

fall and staying longer in the spring and some elk have become residents on the private lands and not using traditional seasonal ranges as they have in the past. This shift in use of private lands often starts during hunting seasons from disturbance to elk from hunting pressure and increased use of motorized vehicles during this time. As a result, elk are causing damage on private lands, and many are not available for public and tribal hunters or wildlife viewing within the Ellis project area.

As noted above, Alternative 5 would have the largest impacts on accessible miles in the Forest with motorized vehicles by the public and provides benefits those who seek some areas with motorized access and some areas without. This alternative also benefits wildlife species that are sensitive to motorized disturbance. Alternative 5 proposes 37,173 acres of preferred big game habitat (elk security), which is the highest amongst the alternatives. Reducing motorized disturbance will benefit elk and other wildlife species and provide a better hunting and wildlife viewing experience in the project area. Elk distribution would likely shift as the elk security acres coupled with proposed vegetation treatments to enhance forage, should encourage elk to stay on public lands and minimize damage to private land agriculture.

As stated by several other comments about the DEIS, specific language in the DEIS lacked information on how the roads closed by this project would be implemented.

- We recommend that any roads that are closed as part of this project are closed with physical barriers instead of just road closure signs. Physical barriers are much more effective at keeping areas closed and are easier to enforce.
 - We understand the need to maintain administrative access for future active management work and to utilize roads for wildfire related activities, etc. but physical barriers would be the best way to ensure these roads are used only for such use.
 - We encourage the agency to consider additional road decommissioning if the roads are to be closed and there are other access points, the road is considered duplicative, or is simply no longer needed.
- Elk show the same avoidance to all motorized vehicles during hunting seasons (Spitz et al. 2019). If physical barriers do not prevent access by motorized vehicles, the closures will not be effective at meeting objectives related to elk security areas.
- We recommend seasonal closures begin before the first hunting season in the fall (archery season) and does not end until the end of elk calving and good green up on the public lands (spring).

Elk redistribution from private back onto public land is a huge issue in the Blue Mountains and across the West and managing the public land is key to making this happen. The TRCP/ORBHA agree with the Oregon Hunters Association and many other organizations and believe that habitat enhancements coupled with increased security (motorized access reductions) will begin to change this dynamic and be a first step in maintaining elk distribution on the public lands. We also suggest a monitoring plan be developed to determine the effectiveness of the different strategies on elk movements, so effective strategies can be shared and replicated across the Blue Mountains.

One final comment on wildlife habitat. We are pleased to see wildlife connectivity corridors being identified up front. We support them being treated with as light a touch as possible including where they intersect with fuel breaks and encourage the agency to continue to incorporate big game and other wildlife migration corridors into land use planning and project planning in the future as new knowledge is identified.

Conclusion:

The TRCP and ORBHA appreciate the opportunity to comment and provide support on the proposed Ellis project and we look forward to working with the Umatilla National Forest and others to implement this project and improve the elk distribution and wildlife habitat in the Ellis project area.

Sincerely,

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References:

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